### **PERKINSCOIE**

August 6, 2018

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VIA ECFS

Marlene H. Dortch Federal Communications Commission Office of the Secretary 445 12th Street, SW Room TW-A325 Washington, D.C. 20554

Re: CenturyLink Communications, LLC f/k/a Qwest Communications Company, LLC v. Verizon Services Corp., et al., EB Docket No. 18-33, File No. EB-18-MD-001

Dear Ms. Dortch:

Pursuant to the Bureau's request, CenturyLink Communications, LLC f/k/a Qwest Communications Company, LLC ("CenturyLink") submits the enclosed dispute category charts. Consistent with the Commission's rules and the Protective Order entered by the Commission's Enforcement Bureau on February 9, 2018.

This Public Version is being filed on ECFS. Courtesy copies of both versions of the submission are also being provided to the Secretary's office and the Commission's Enforcement Bureau. In addition, electronic copies of both versions are being provided to counsel for Verizon.

Please contact me if you have any questions.

Sincerely

Marc S Martir

Enclosures

ce: Lisa Saks, Market Disputes Resolution Div., Federal Communications Commission Curtis L. Groves, Verizon Joshua D. Branson, Kellogg Hansen P.L.L.C.

# Table 1: Dispute Category 1 Miscalculating Equivalents for DS3 CLF Units in FMS LATAs

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Service Agreement <sup>1</sup>	Plan Quarter	Claim #	Dispute Filed Date <sup>2</sup>	Automated Denial Date <sup>3</sup>	Substantive Response Date <sup>4</sup>	Miscalculating Equivalents for DS3 CLF Units (Cat. 1)
2009	PY5Q1 (03/13-05/13)	CLINKFAC0186 <sup>5</sup>	07/31/14	07/31/14	09/15/14	
2009	PY5Q2 (06/13-08/13)	CLINKFAC0185 <sup>6</sup>	07/31/14	07/31/14	09/15/14	
2009	PY5Q3 (09/13-11/13)	CLINKFAC0184 <sup>7</sup>	07/31/14	07/31/14	09/15/14	
2009	PY5Q4 (12/13-02/14)	CLINKFAC01688	06/19/14	06/19/14	09/15/14	
2014	PY1Q1 (03/13-05/13)	CLINKFAC03769	09/15/15	09/15/15	09/15/14	
2014	PY1Q2 (06/13-08/13)	CLINKFAC0377 <sup>10</sup>	09/15/15	09/17/15	09/15/14	

<sup>&</sup>lt;sup>1</sup> In addition to the Service Agreements, related agreements such as the Master Services Agreement are also relevant to each dispute category. *See, e.g.*, Formal Complaint, Summary of Governing Agreements.

<sup>&</sup>lt;sup>2</sup> See Formal Complaint, Legal Analysis, at 9-11 (Table of CenturyLink-Verizon Claims).

<sup>&</sup>lt;sup>3</sup> The Automated Denial Date is the date that Verizon's system denied dispute submissions. Subsequently, CenturyLink worked with Verizon to get the claims manually loaded into the Verizon system. *See, e.g.*, Brown Reply Decl. ¶¶ 17-19.

<sup>&</sup>lt;sup>4</sup> The first substantive response Verizon provided for Dispute Category 1 was contained in email exchanges between Tiffany Brown (CenturyLink) and Joseph Aguilar (Verizon) (September 15, 2014), although that response did not provide any supporting facts or tariff citations. *See* Exhibit 40.01. In addition, from this period through May 2015, Verizon indicated that the disputes would remain open, continued to request and receive additional supporting information from CenturyLink, and claimed it would set up further meetings to discuss (which it did not). *See*, *e.g.*, Exhibit 40.03; Complaint ¶¶ 85-87; Brown Decl. ¶¶ 49-56.

<sup>&</sup>lt;sup>5</sup> See Exhibits 37.06 (claim submission), 37.15 (automated denial).

<sup>&</sup>lt;sup>6</sup> See Exhibits 38.05 (claim submission), 38.13 (automated denial).

<sup>&</sup>lt;sup>7</sup> See Exhibits 39.05 (claim submission), 39.13 (automated denial).

<sup>&</sup>lt;sup>8</sup> See Exhibits 40.13 (claim submission), 40.14 (automated denial).

<sup>&</sup>lt;sup>9</sup> See Exhibits 41.01 (claim submission), 41.07 (automated denial).

<sup>&</sup>lt;sup>10</sup> See Exhibits 42.02 (claim submission), 42.08 (automated denial).

Table 2: Dispute Category 2 – Including Units Without Qualifying USCOS or MRCS

	CONFIDENT						
Service Agreement	Plan Quarter	Claim#	Dispute Filed Date <sup>11</sup>	Automated Denial Date <sup>12</sup>	Substantive Response Date <sup>13</sup>	Including Units Without USOCs (Cat. 2)	
2009	PY5Q1 (03/13-05/13)	CLINKFAC0186 <sup>14</sup>	07/31/14	07/31/14	08/03/16		
2009	PY5Q2 (06/13-08/13)	CLINKFAC0185 <sup>15</sup>	07/31/14	07/31/14	08/03/16		
2009	PY5Q3 (09/13-11/13)	CLINKFAC0184 <sup>16</sup>	07/31/14	07/31/14	08/03/16		
2009	PY5Q4 (12/13-02/14)	CLINKFAC0168 <sup>17</sup>	06/19/14	06/19/14	08/03/16		
2014	PY1Q1 (03/14-05/14)	CLINKFAC0376 <sup>18</sup>	09/15/15	09/15/15	08/03/16		
2014	PY1Q2 (06/14-08/14)	CLINKFAC0377 <sup>19</sup>	09/15/15	09/17/15	08/03/16		
2014	PY1Q3 (09/14-11/14)	CLINKFAC0378 <sup>20</sup>	09/15/15	09/17/15	08/03/16		
2014	PY1Q4 (12/14-02/15)	CLINKFAC0379 <sup>21</sup>	09/15/15	09/17/15	08/03/16		
2014	PY2Q1 (03/15-05/13)	CLINKFAC0380 <sup>22</sup>	09/15/15	09/17/15	08/03/16		
2014	PY2Q2 (06/15-08/15)	CLINKFAC0421 <sup>23</sup>	10/29/15	10/29/15	08/03/16		

<sup>&</sup>lt;sup>11</sup> See Formal Complaint, Legal Analysis, at 9-11 (Table of CenturyLink-Verizon Claims).

<sup>&</sup>lt;sup>12</sup> The Automated Denial Date is the date that Verizon's system denied dispute submissions. Subsequently, CenturyLink worked with Verizon to get the claims manually loaded into the Verizon system. *See, e.g.*, Brown Reply Decl. ¶¶ 17-19.

<sup>&</sup>lt;sup>13</sup> The first non-automated response Verizon provided was contained in Verizon's Response to the Dispute Notice Letter from David Szol (Verizon) to Patrick Welch (CenturyLink), dated May 31, 2016. *See* Exhibit 40.23. This was a generic response for all dispute categories stating Verizon's position that Billing Credits were not subject to dispute. The first substantive response specific to Category 2 was contained in Verizon's Response to Notice of Informal Complaint (August 3, 2016) (File No. EB-16-MDIC-0015). Verizon did not provide a circuit level analysis of the dispute until its Answer to CenturyLink's Formal Complaint (April 12, 2018). Verizon Exhibit 60 contains Verizon's response to each circuit disputed. In addition, *see* ¶ 48-51 of Verizon's Answer and ¶ 69-78 of Ms. Mason's Declaration. CenturyLink's response is contained in its Reply and supporting materials.

<sup>&</sup>lt;sup>14</sup> See Exhibits 37.06 (claim submission), 37.15 (automated denial).

<sup>&</sup>lt;sup>15</sup> See Exhibits 38.05 (claim submission), 38.13 (automated denial).

<sup>&</sup>lt;sup>16</sup> See Exhibits 39.05 (claim submission), 39.13 (automated denial).

<sup>&</sup>lt;sup>17</sup> See Exhibits 40.13 (claim submission), 40.14 (automated denial).

<sup>&</sup>lt;sup>18</sup> See Exhibits 41.01 (claim submission), 41.07 (automated denial).

<sup>&</sup>lt;sup>19</sup> See Exhibits 42.02 (claim submission), 42.08 (automated denial).

<sup>&</sup>lt;sup>20</sup> See Exhibits 43.01 (claim submission), 43.11 (automated denial).

<sup>&</sup>lt;sup>21</sup> See Exhibits 44.01 (claim submission), 44.06 (automated denial).

<sup>&</sup>lt;sup>22</sup> See Exhibits 45.01 (claim submission), 45.07 (automated denial).

<sup>&</sup>lt;sup>23</sup> See Exhibits 46.01 (claim submission), 46.08 (automated denial).

Service Agreement	Plan Quarter	Claim#	Dispute Filed Date <sup>11</sup>	Automated Denial Date <sup>12</sup>	Substantive Response Date <sup>13</sup>	Including Units Without USOCs (Cat. 2)
2014	PY2Q3 (09/15-11/15)	CLINKFAC0469 <sup>24</sup>	02/05/16	02/05/16	08/03/16	
2014	PY2Q4 (12/15-02/16)	CLINKFAC0505B <sup>25</sup>	07/13/16	07/13/16	08/03/16	
2014	PY3Q1 (03/16-05/16)	CLINKFAC0610B <sup>26</sup>	01/11/17	01/12/17	08/03/16	
2014	PY3Q2 (06/16-08/16)	CLINKFAC0765B <sup>27</sup>	03/17/17	None	08/03/16	
2014	PY3Q3 (09/16-11/16)	CLINKFAC0766B <sup>28</sup>	03/17/17	None	08/03/16	
2014	PY3Q4 (12/16-02/17)	CLINKFAC0797B <sup>29</sup>	04/21/17	None	08/03/16	

 $<sup>^{24}</sup>$  See Exhibits 47.01 (claim submission), 47.06a (Excel spreadsheet reflecting automated denial).

<sup>&</sup>lt;sup>25</sup> See Exhibits 48.01 (claim submission), 48.07 (automated denial).

<sup>&</sup>lt;sup>26</sup> See Exhibits 49.07 (claim submission), 49.08 (automated denial).

<sup>&</sup>lt;sup>27</sup> See Exhibit 50.01 (claim submission).

<sup>&</sup>lt;sup>28</sup> See Exhibit 51.01 (claim submission).

<sup>&</sup>lt;sup>29</sup> See Exhibit 52.01 (claim submission).

**Table 3: Dispute Category 3 – Double Counting Circuits** 

						CONFIDENTIAL
Service Agreement	Plan Quarter	Claim#	Dispute Filed Date <sup>30</sup>	Automated Denial Date <sup>31</sup>	Substantive Response Date <sup>32</sup>	Double-Counting Units (Cat. 3)
2009	PY5Q1 (03/13-05/13)	CLINKFAC0186 <sup>33</sup>	07/31/14	07/31/14	08/03/16	
2009	PY5Q2 (06/13-08/13)	CLINKFAC0185 <sup>34</sup>	07/31/14	07/31/14	08/03/16	
2009	PY5Q3 (09/13-11/13)	CLINKFAC0184 <sup>35</sup>	07/31/14	07/31/14	08/03/16	
2009	PY5Q4 (12/13-02/14)	CLINKFAC0168 <sup>36</sup>	06/19/14	06/19/14	08/03/16	
2014	PY1Q1 (03/14-05/14)	CLINKFAC0376 <sup>37</sup>	09/15/15	09/15/15	08/03/16	
2014	PY1Q2 (06/14-08/14)	CLINKFAC0377 <sup>38</sup>	09/15/15	09/17/15	08/03/16	
2014	PY1Q3 (09/14-11/14)	CLINKFAC0378 <sup>39</sup>	09/15/15	09/17/15	08/03/16	
2014	PY1Q4 (12/14-02/15)	CLINKFAC0379 <sup>40</sup>	09/15/15	09/17/15	08/03/16	
2014	PY2Q1 (03/15-05/15)	CLINKFAC0380 <sup>41</sup>	09/15/15	09/17/15	08/03/16	
2014	PY2Q2 (06/15-08/15)	CLINKFAC0421 <sup>42</sup>	10/29/15	10/29/15	08/03/16	

<sup>&</sup>lt;sup>30</sup> See Formal Complaint, Legal Analysis, at 9-11 (Table of CenturyLink-Verizon Claims).

<sup>&</sup>lt;sup>31</sup> The Automated Denial Date is the date that Verizon's system denied dispute submissions. Subsequently, CenturyLink worked with Verizon to get the claims manually loaded into the Verizon system. *See, e.g.*, Brown Reply Decl. ¶¶ 17-19.

<sup>&</sup>lt;sup>32</sup> The first non-automated response Verizon provided was contained in Verizon's Response to the Dispute Notice Letter from David Szol (Verizon) to Patrick Welch (CenturyLink), dated May 31, 2016. *See* Exhibit 40.23. This was a generic response for all dispute categories stating Verizon's position that Billing Credits were not subject to dispute. The first substantive response specific to Category 3 was contained in Verizon's Response to Notice of Informal Complaint (August 3, 2016) (File No. EB-16-MDIC-0015). Verizon did not provide a circuit level analysis of the dispute until its Answer to CenturyLink's Formal Complaint (April 12, 2018). Verizon Exhibit 64 contains Verizon's response to each circuit disputed. In addition, *see* ¶ 52-56 of Verizon's Answer and ¶ 79-86 of Ms. Mason's Declaration. CenturyLink's response is contained in its Reply and supporting materials.

<sup>&</sup>lt;sup>33</sup> See Exhibits 37.06 (claim submission), 37.15 (automated denial).

<sup>&</sup>lt;sup>34</sup> See Exhibits 38.05 (claim submission), 38.13 (automated denial).

<sup>&</sup>lt;sup>35</sup> See Exhibits 39.05 (claim submission), 39.13 (automated denial).

<sup>&</sup>lt;sup>36</sup> See Exhibits 40.13 (claim submission), 40.14 (automated denial).

<sup>&</sup>lt;sup>37</sup> See Exhibits 41.01 (claim submission), 41.07 (automated denial).

<sup>&</sup>lt;sup>38</sup> See Exhibits 42.02 (claim submission), 42.08 (automated denial).

<sup>&</sup>lt;sup>39</sup> See Exhibits 43.01 (claim submission), 43.11 (automated denial).

<sup>&</sup>lt;sup>40</sup> See Exhibits 44.01 (claim submission), 44.06 (automated denial).

<sup>&</sup>lt;sup>41</sup> See Exhibits 45.01 (claim submission), 45.07 (automated denial).

<sup>&</sup>lt;sup>42</sup> See Exhibits 46.01 (claim submission), 46.08 (automated denial).

Service Agreement	Plan Quarter	Claim#	Dispute Filed Date <sup>30</sup>	Automated Denial Date <sup>31</sup>	Substantive Response Date <sup>32</sup>	Double-Counting Units (Cat. 3)
2014	PY2Q3 (09/15-11/15)	CLINKFAC0469 <sup>43</sup>	02/05/16	02/05/16	08/03/16	
2014	PY2Q4 (12/15-02/16)	CLINKFAC0505B <sup>44</sup>	07/13/16	07/13/16	08/03/16	
2014	PY3Q1 (03/16-05/16)	CLINKFAC0610B <sup>45</sup>	01/11/17	01/12/17	08/03/16	

<sup>&</sup>lt;sup>43</sup> See Exhibits 47.01 (claim submission), 47.06a (Excel spreadsheet reflecting automated denial).

See Exhibits 48.01 (claim submission), 48.07 (automated denial).
 See Exhibits 49.07 (claim submission), 49.08 (automated denial).

Table 4: Dispute Category 4 – Misdesignating DS3 CLF Units

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Service Agreement	Plan Quarter	Claim#	Dispute Filed Date <sup>46</sup>	Automated Denial Date <sup>47</sup>	Substantive Response Date <sup>48</sup>	DS3 CLF Units (Cat. 4)
2014	PY1Q1 (03/14-05/14)	CLINKFAC0376 <sup>49</sup>	09/15/15	09/15/15	08/03/16	
2014	PY1Q2 (06/14-08/14)	CLINKFAC0377 <sup>50</sup>	09/15/15	09/17/15	08/03/16	
2014	PY2Q1 (03/15-05/15)	CLINKFAC0380 <sup>51</sup>	09/15/15	09/17/15	08/03/16	

<sup>&</sup>lt;sup>46</sup> See Formal Complaint, Legal Analysis, at 9-11 (Table of CenturyLink-Verizon Claims).

<sup>&</sup>lt;sup>47</sup> The Automated Denial Date is the date that Verizon's system denied dispute submissions. Subsequently, CenturyLink worked with Verizon to get the claims manually loaded into the Verizon system. *See, e.g.*, Brown Reply Decl. ¶¶ 17-19.

<sup>&</sup>lt;sup>48</sup> The first non-automated response Verizon provided was contained in Verizon's Response to the Dispute Notice Letter from David Szol (Verizon) to Patrick Welch (CenturyLink), dated May 31, 2016. *See* Exhibit 40.23. This was a generic response for all dispute categories stating Verizon's position that Billing Credits were not subject to dispute. The first substantive response specific to Category 4 was contained in Verizon's Response to Notice of Informal Complaint (August 3, 2016) (File No. EB-16-MDIC-0015). Verizon did not provide a circuit level analysis of the dispute until its Answer to CenturyLink's Formal Complaint (April 12, 2018). Verizon Exhibit 65 contains Verizon's response to each circuit disputed. In addition, *see* ¶ 57-59 of Verizon's Answer and ¶ 87-89 of Ms. Mason's Declaration. CenturyLink's response is contained in its Reply and supporting materials.

<sup>&</sup>lt;sup>49</sup> See Exhibits 41.01 (claim submission), 41.07 (automated denial).

<sup>&</sup>lt;sup>50</sup> See Exhibits 42.02 (claim submission), 42.08 (automated denial).

<sup>&</sup>lt;sup>51</sup> See Exhibits 45.01 (claim submission), 45.07 (automated denial).

Table 5: Dispute Category 5 – Misdesignating DS0 Units

Service Agreement	Plan Quarter	Claim#	Dispute Filed Date <sup>52</sup>	Automated Denial Date <sup>53</sup>	Substantive Response Date <sup>54</sup>	DS0 Units (Cat. 5)
2009	PY5Q1 (03/13-05/13)	CLINKFAC0186 <sup>55</sup>	07/31/14	07/31/14	08/03/16	
2009	PY5Q2 (06/13-08/13)	CLINKFAC0185 <sup>56</sup>	07/31/14	07/31/14	08/03/16	
2009	PY5Q3 (09/13-11/13)	CLINKFAC0184 <sup>57</sup>	07/31/14	07/31/14	08/03/16	
2009	PY5Q4 (12/13-02/14)	CLINKFAC0168 <sup>58</sup>	06/19/14	06/19/14	08/03/16	
2014	PY1Q1 (03/14-05/13)	CLINKFAC0376 <sup>59</sup>	09/15/15	09/15/15	08/03/16	
2014	PY1Q2 (06/14-08/14)	CLINKFAC0377 <sup>60</sup>	09/15/15	09/17/15	08/03/16	
2014	PY1Q3 (09/14-11/14)	CLINKFAC0378 <sup>61</sup>	09/15/15	09/17/15	08/03/16	
2014	PY1Q4 (12/14-02/15)	CLINKFAC0379 <sup>62</sup>	09/15/15	09/17/15	08/03/16	
2014	PY2Q1 (03/15-05/15)	CLINKFAC0380 <sup>63</sup>	09/15/15	09/17/15	08/03/16	
2014	PY2Q2 (06/15-08/15)	CLINKFAC0421 <sup>64</sup>	10/29/15	10/29/15	08/03/16	

<sup>&</sup>lt;sup>52</sup> See Formal Complaint, Legal Analysis, at 9-11 (Table of CenturyLink-Verizon Claims).

<sup>&</sup>lt;sup>53</sup> The Automated Denial Date is the date that Verizon's system denied dispute submissions. Subsequently, CenturyLink worked with Verizon to get the claims manually loaded into the Verizon system. *See, e.g.*, Brown Reply Decl. ¶¶ 17-19.

<sup>54</sup> The first non-automated response Verizon provided was contained in Verizon's Response to the Dispute Notice Letter from David Szol (Verizon) to Patrick Welch (CenturyLink), dated May 31, 2016. *See* Exhibit 40.23. This was a generic response for all dispute categories stating Verizon's position that Billing Credits were not subject to dispute. The first substantive response specific to Category 5 was contained in Verizon's Response to Notice of Informal Complaint (August 3, 2016) (File No. EB-16-MDIC-0015). Verizon did not provide a circuit level analysis of the dispute until its Answer to CenturyLink's Formal Complaint (April 12, 2018). Verizon Exhibit 67 contains Verizon's response to each circuit disputed. In addition, *see* ¶ 60-63 of Verizon's Answer and ¶ 90-92 of Ms. Mason's Declaration. CenturyLink's response is contained in its Reply and supporting materials.

<sup>&</sup>lt;sup>55</sup> See Exhibits 37.06 (claim submission), 37.15 (automated denial).

<sup>&</sup>lt;sup>56</sup> See Exhibits 38.05 (claim submission), 38.13 (automated denial).

<sup>&</sup>lt;sup>57</sup> See Exhibits 39.05 (claim submission), 39.13 (automated denial).

<sup>&</sup>lt;sup>58</sup> See Exhibits 40.13 (claim submission), 40.14 (automated denial).

<sup>&</sup>lt;sup>59</sup> See Exhibits 41.01 (claim submission), 41.07 (automated denial).

<sup>&</sup>lt;sup>60</sup> See Exhibits 42.02 (claim submission), 42.08 (automated denial).

<sup>&</sup>lt;sup>61</sup> See Exhibits 43.01 (claim submission), 43.11 (automated denial).

<sup>&</sup>lt;sup>62</sup> See Exhibits 44.01 (claim submission), 44.06 (automated denial).

<sup>&</sup>lt;sup>63</sup> See Exhibits 45.01 (claim submission), 45.07 (automated denial).

<sup>&</sup>lt;sup>64</sup> See Exhibits 46.01 (claim submission), 46.08 (automated denial).

Service Agreement	Plan Quarter	Claim#	Dispute Filed Date <sup>52</sup>	Automated Denial Date <sup>53</sup>	Substantive Response Date <sup>54</sup>	DS0 Units (Cat. 5)
2014	PY2Q3 (09/15-11/15)	CLINKFAC0469 <sup>65</sup>	02/05/16	02/05/16	08/03/16	
2014	PY2Q4 (12/15-02/16)	CLINKFAC0505B <sup>66</sup>	07/13/16	07/13/16	08/03/16	
2014	PY3Q1 (03/16-05/16)	CLINKFAC0610B <sup>67</sup>	01/11/17	01/12/17	08/03/16	
2014	PY3Q2 (06/16-08/16)	CLINKFAC0765B <sup>68</sup>	03/17/17	None	08/03/16	
2014	PY3Q3 (09/16-11/16)	CLINKFAC0766B <sup>69</sup>	03/17/17	None	08/03/16	
2014	PY3Q4 (12/16-02/17)	CLINKFAC0797B <sup>70</sup>	04/21/17	None	08/03/16	

 $<sup>^{65}</sup>$  See Exhibits 47.01 (claim submission), 47.06a (Excel spreadsheet reflecting automated denial).

<sup>&</sup>lt;sup>66</sup> See Exhibits 48.01 (claim submission), 48.07 (automated denial).

<sup>&</sup>lt;sup>67</sup> See Exhibits 49.07 (claim submission), 49.08 (automated denial).

<sup>&</sup>lt;sup>68</sup> See Exhibit 50.01 (claim submission).

<sup>&</sup>lt;sup>69</sup> See Exhibit 51.01 (claim submission).

<sup>&</sup>lt;sup>70</sup> See Exhibit 52.01 (claim submission).

#### Table 6: Dispute Category 6 – Failure to Optimize Circuit Routing

CONFIDENTIAL							
Service Agreement	Plan Quarter	Claim #	Dispute Filed Date <sup>71</sup>	Automated Denial Date <sup>72</sup>	Substantive Response Date <sup>73</sup>	Failure to Optimize Circuit Routing (Cat. 6)	
2014	PY1Q2 thru PY2Q3 (07/14-09/15)	CLINKFAC0391 <sup>74</sup>	09/30/15	10/29/2015	05/31/16		
2014	PY1Q2 thru PY2Q3 (07/14-09/15)	CLINKFAC0391B <sup>75</sup>	09/30/15	10/29/15	05/31/16		
2014	PY1Q2 thru PY2Q3 (07/14-09/15)	CLINKFAC0396 <sup>76</sup>	09/30/15	09/30/15	05/31/16		
2014	PY1Q2 thru PY2Q3 (07/14-09/15)	CLINKFAC0396B <sup>77</sup>	09/30/15	10/29/15	05/31/16		
2014	PY1Q2 thru PY2Q3 (07/14-09/15)	CLINKFAC0416 <sup>78</sup>	10/29/15	11/30/15	05/31/16		
2014	PY1Q2 thru PY2Q3 (07/14-09/15)	CLINKFAC0416B <sup>79</sup>	10/29/2015	10/29/15	05/31/16		
2014	PY1Q2 thru PY2Q3 (07/14-09/15)	CLINKFAC0417 <sup>80</sup>	10/29/15	None	05/31/16		
2014	PY1Q2 thru PY2Q3 (07/14-09/15)	CLINKFAC0418 <sup>81</sup>	10/29/15	10/29/15	05/31/16		
2014	PY2Q3 (10/15-11/15)	CLINKFAC0391BTU1 <sup>82</sup>	03/10/16	None	05/31/16		

<sup>&</sup>lt;sup>71</sup> See Formal Complaint, Legal Analysis, at 9-11 (Table of CenturyLink-Verizon Claims).

<sup>&</sup>lt;sup>72</sup> The Automated Denial Date is the date that Verizon's system denied dispute submissions. Subsequently, CenturyLink worked with Verizon to get the claims manually loaded into the Verizon system. *See, e.g.*, Brown Reply Decl. ¶¶ 17-19.

<sup>&</sup>lt;sup>73</sup> The first substantive response Verizon provided for Dispute Category 6 was contained in Verizon's Response to the Dispute Notice Letter from David Szol (Verizon) to Patrick Welch (CenturyLink), dated May 31, 2016. *See* Exhibit 40.23. CenturyLink's response is contained in its Reply and supporting materials.

<sup>&</sup>lt;sup>74</sup> See Exhibits 53.01 (claim submission), 53.02, 53.03 (automated denial).

<sup>&</sup>lt;sup>75</sup> See Exhibits 54.01 (claim submission), 54.02, 54.03(automated denials).

<sup>&</sup>lt;sup>76</sup> See Exhibits 57.01 (claim submission), 57.02, 57.03 (automated denials).

<sup>&</sup>lt;sup>77</sup> See Exhibits 58.01 (claim submission), 58.02 (automated denial).

<sup>&</sup>lt;sup>78</sup> See Exhibits 61.01 (claim submission), 61.02, 61.03 (automated denials).

<sup>&</sup>lt;sup>79</sup> See Exhibits 62.02 (claim submission), 62.01, 62.03 (automated denials).

<sup>&</sup>lt;sup>80</sup> See Exhibits 65.01 (claim submission), 65.02 (acknowledgment).

<sup>81</sup> See Exhibits 67.01 (claim submission), 67.02 (automated denial).

<sup>82</sup> See Exhibits 55.01 (claim submission), 55.02, 55.03 (acknowledgments).

Service Agreement	Plan Quarter	Claim#	Dispute Filed Date <sup>71</sup>	Automated Denial Date <sup>72</sup>	Substantive Response Date <sup>73</sup>	Failure to Optimize Circuit Routing (Cat. 6)
2014	PY2Q3 (10/15-11/15)	CLINKFAC0391TU1 <sup>83</sup>	03/10/16	None	05/31/16	
2014	PY2Q3 (10/15-11/15)	CLINKFAC0396BTU1 <sup>84</sup>	03/10/16	None	05/31/16	
2014	PY2Q3 (10/15-11/15)	CLINKFAC0396TU1 <sup>85</sup>	03/10/16	None	05/31/16	
2014	PY2Q3 (10/15-11/15)	CLINKFAC0416BTU1 <sup>86</sup>	03/10/16	None	05/31/16	
2014	PY2Q3 (10/15-11/15)	CLINKFAC0416TU1 <sup>87</sup>	03/10/16	None	05/31/16	
2014	PY2Q3 (10/15-11/15)	CLINKFAC0417TU1 <sup>88</sup>	03/10/16	None	05/31/16	
2014	PY2Q3 (10/15-11/15)	CLINKFAC0418TU1 <sup>89</sup>	03/10/16	None	05/31/16	

<sup>83</sup> See Exhibits 56.01 (claim submission), 56.02, 55.06 (acknowledgments).

<sup>&</sup>lt;sup>84</sup> See Exhibits 59.01 (claim submission), 59.02, 59.03 (acknowledgments).

<sup>85</sup> See Exhibit 60.01 (claim submission).

<sup>&</sup>lt;sup>86</sup> See Exhibits 63.01 (claim submission), 63.02, 63.03 (acknowledgments).

<sup>&</sup>lt;sup>87</sup> See Exhibits 64.01 (claim submission), 64.02, 64.03 (acknowledgments).

<sup>&</sup>lt;sup>88</sup> See Exhibits 66.01 (claim submission), 66.02, 66.03 (acknowledgments).

<sup>&</sup>lt;sup>89</sup> See Exhibits 68.01 (claim submission), 68.02, 68.03 (acknowledgments).

#### CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2018, pursuant to the Protective Order and the May 18, 2018 Letter Order, I caused a copy of the foregoing dispute category charts to be served as indicated below to the following:

Marlene H. Dortch
Office of the Secretary
Market Disputes Resolution Division
Enforcement Bureau
Federal Communication Commission
445 12th Street, SW
Washington, D.C. 20554
(Original of the Public Version and Confidential version via Hand Delivery)

Lisa Saks
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Date: August 6, 2018 Respectfully submitted,

Sheri Pais